

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

CIVIL DIVISION

GENERAL CIVIL COVER SHEET

Case Caption	MOSLEY v. ROMERO
Case Number	
Plaintiff:	Jackson Phillip Mosley
Defendant:	José Romero
Nature of Case:	0399 – Other Tort (Defamation / Intentional Torts)
Relief Sought:	Money Damages; Punitive Damages; Injunctive Relief, Add'l As Prayed
Jury Demand:	Yes–12 Person
Related Cases:	None
Jurisdiction:	D.C. Code § 11-921
Amount in Controversy:	Exceeds \$1,186,204

Certification:

I certify that the information provided on this cover sheet is true and complete to the best of my knowledge.

Date: 02/18/2026

Signature: /s/Jackson Phillip Mosley

Name: Jackson Phillip Mosley

Phone: 703-395-1596

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION

Jackson P. Mosley 401 P Street, NW, Washington, DC 20001, <i>Plaintiff,</i> v. José Ivan Romero Washington, DC 202-423-9669 r.jose.romero@gmail.com <i>Defendant.</i>	<i>JURY DEMAND ENDORSED HEREIN</i> Civil Action No. _____ MOSLEY v. ROMERO Judge Hon. _____
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COMPLAINT FOR DEFAMATION PER SE, TORTIOUS INTERFERENCE, AND CIVIL CONSPIRACY

I. INTRODUCTION

1 Defendant struck a match upon mistruths, lit a fire, then poured gasoline on it—an attention-
2 seeking arsonist intent on destroying Plaintiff’s hard-earned reputation to stoke the dwindling
3 flame of Defendant’s relevance.

4 Defendant has built a façade in the form of “DCHomos” —an illusion of, and insult to, objective
5 journalism.

6 He portrays an image of a cute gaggle of gays innocently reporting the latest “news” and “hot
7 goss,” when the clinical reality speaks to nothing more than the telltale of a late-40s, jealous
8 cyberbully with zero self-worth and immense unhappiness. Someone that feeds on chaos,
9 divisiveness, and any sort of attention to mask his own wide-ranging shortcomings.

10 Defendant purposely disassociates himself from what he publishes knowing his platform would
11 collapse if the people who consume his content knew who was really behind the keyboard. He
12 considers any attempt to unveil or link things to him as an attack.

13 Defendant has a long history of intentionally disparaging members of the LGBTQ+ community
14 while, ironically, serving as a volunteer for the Capital Pride Alliance—an organization that
15 embodies values which condemn the sort of content and ad-hominem attacks he pedals.

16 Defendant’s pattern is clear and unmistakable.

17 Some of his content is certifiable opinion. Some of it is documented fact. Other blips are merely
18 “poking fun” —forgettable nonsense that gets little-to-no engagement from a macro perspective.

19 However, the content designed and executed specifically to hurt Plaintiff was, and is, a
20 calculated campaign that has consumed nearly forty percent of Defendant’s posts over the span
21 of two months—and just shy of eighty percent of his overall engagement and reach.

22 RUSH opened its doors on December 5, 2025, after eight relentless months of planning,
23 building, and financing—sacrificing and risking everything to build a unique, fun, and safe space
24 for the community.

25 Over \$1.18 million was invested into securing the leased premises, completing construction, and
26 acquiring furniture, fixtures, and equipment.

27 RUSH was corporately owned and governed. Plaintiff serves as Chief Executive Officer of
28 Momentux (Mo-men-tux)—and was acting as an employee and executive operator, not as a sole
29 owner.

30 Less than two weeks after RUSH opened its doors, Defendant escalated a campaign that did not
31 merely question business operations—he declared criminality and incompetence.

32 He told the public Plaintiff was a “wanted fugitive.”

33 He announced that RUSH had “lost” its liquor license.

34 He implied that payroll was never paid.

35 He suggested involvement of the Attorney General that did not exist.

36 He juxtaposed criminal statutes next to Plaintiff’s name.

37 These were not neutral posts. They were declaratory. They were inflammatory. They were
38 purposely designed to be consumed as fact. When the initial posts gave this desperate bully
39 attention that he had not seen in quite some time, he made it his mission to publish whatever he
40 needed to get the “fix” he craves. The post themselves, in many cases, were just the start—
41 Defendant rallied engagement with new comments anytime the numbers dropped. Anything that
42 could be interpreted in a positive light—any comments or engagement that spoke in Plaintiff’s
43 favor or played “Devil’s Advocate” —were removed.

44 When a person is called a fugitive—people do not hear nuance. They hear “criminal.”

45 When the lay hears or sees court filings of any sort—civil or criminal—it’s immediately
46 translated to “bad person.”

47 When a business is said to have “lost” its liquor license—people believe it.

48 Landlords believe it. Lenders believe it. Vendors believe it. Government officials believe it.

49 It is easy to boycott a business you have never visited. It is easy to hate someone you have never
50 met. It is easy to condemn a space before it has had the opportunity to stand on its own merits.

51 Defendant capitalized on that vulnerability.

52 Defendant received monetary and non-monetary “encouragement” from certain competitors and
53 individuals.

54 Defendant accepted “tips” and rumors, along with commentary of employees that were fired for
55 misconduct and gross misconduct. Defendant knew it was unreasonable to consider any such
56 rhetoric reliable, but he twisted and published in full disregard.

57 As multiple screenshots and evidence show, Defendant went to great lengths to cast public
58 shame on any person—customers and employees—that continued to support RUSH or Plaintiff
59 in any way.

60 The fallout of Defendant’s actions was immediate and severe.

61 Within days, revenue destabilized. Credit relationships tightened or terminated. Replacement
62 financing became impossible to secure.

63 The landlord—who had been patient and aligned in wanting the business to succeed despite the
64 setbacks and delays in opening—began escalating legal action amid growing fear that the
65 business would not recover under the cloud of criminal branding.

66 Plaintiff’s spouse was publicly exposed and attacked.

67 Threats to safety were received and encouraged.

68 Government stakeholders raised concerns.

69 The community was turned hostile.

70 Plaintiff was forced to withdraw from public life.

71 Defendant did not correct the record when facts prevailed. In fact, he often posted about them
72 after resolution to add a smoke screen over any perceived positivity—continuously.

73 Defendant had the right to speak.

74 He did not have the right to fabricate criminal status or materially misrepresent regulatory
75 actions.

76 He did not have the right to deliver opinion as fact.

77 He did not have the right to intentionally, knowingly cause irreparable psychological harm to
78 Plaintiff—a man that he has never met.

79 This case is not about criticism. It is not about disagreement. It is not about gossip.

80 It is about falsely branding a man as an incompetent, unqualified, conman and criminal—
81 repeatedly, publicly, and strategically—within a community that, however unfortunate, is overly
82 susceptible and impressionable to “drama” and gossip.

II. PARTIES

- 83 **1.** Plaintiff Jackson Phillip Mosley is a resident of the District of Columbia.
- 84 **2.** Plaintiff is a serial entrepreneur, investor, author, motivational speaker, and
85 philanthropist.
- 86 **3.** At all times relevant to this action, Plaintiff served as Chief Executive Officer of
87 Momentux, the parent company of the entity that managed RUSH (Rainbow Zebra LLC).

- 88 **4.** RUSH was corporately owned and operated through a structured governance framework
89 involving multiple stakeholders and decision-makers.
- 90 **5.** Plaintiff acted in his capacity as an employee and executive officer of Momentux and was
91 not the sole owner or unilateral beneficiary of RUSH.
- 92 **6.** Since the events giving rise to this action, RUSH has been sold and Plaintiff is no longer
93 involved in its daily operations.
- 94 **7.** Upon information and belief, Defendant José Romero is a resident of the District of
95 Columbia and operates the social media platform known as “DCHomos,” publishing
96 content to Instagram, Facebook, X (Twitter), Bluesky, and TikTok.
- 97 **8.** Upon information and belief, Defendant operates DCHomos as a sole proprietor and
98 receives monetization income from any well-performing content monthly.
- 99 **9.** Upon information and belief, Defendant is employed by law firm Wilmer Cutler
100 Pickering Hale and Dorr LLP (WilmerHale) as a senior information technology support
101 specialist.
- 102 **10.** Upon information and belief, Defendant is a volunteer for The Capital Pride Alliance and
103 manages the organization’s social media accounts.

III. JURISDICTION AND VENUE

- 104 **11.** This Court has subject matter jurisdiction pursuant to D.C. Code § 11-921.
- 105 **12.** Venue is proper because the statements at issue were published in the District of
106 Columbia and caused harm within the District.

IV. FACTUAL ALLEGATIONS

The Launch of RUSH

107 **13.** RUSH officially opened on December 5, 2025.

108 **14.** The total capital deployed in securing the lease, completing buildout, and acquiring
109 furniture, fixtures, and equipment exceeded \$1,186,204 based on contemporaneous
110 accounting records maintained in the ordinary course of business.

111 **15.** RUSH was launched with structured financing arrangements, including access to credit
112 facilities designed to bridge early operational volatility. Plaintiff planned accordingly for
113 this volatility.

114 **16.** Missed or delayed payroll in the hospitality industry is not uncommon or groundbreaking
115 news. It certainly is not a good thing, but it happens and happens often.

116 **17.** Early-stage hospitality ventures routinely experience revenue fluctuations during their
117 initial growth phase.

118 **18.** Regulatory stability, lender confidence, and public perception were essential during this
119 period.

Defendant's Escalating Publications

120 **19.** Beginning less than two weeks after RUSH's grand opening, Defendant began publishing
121 a series of posts concerning Plaintiff and RUSH. Defendant's publications concerning
122 Plaintiff from December 15, 2025, through the present exceed 500 separate references
123 across multiple platforms. Representative examples are attached collectively as Exhibit

124 H. These publications demonstrate a sustained and escalating pattern of defamatory and
125 inflammatory conduct.

126 **20.** Defendant repeatedly referred to Plaintiff as the “owner” of RUSH despite the
127 corporately governed structure described above which Defendant could have verified.
128 Defendant knew that by linking RUSH and Plaintiff together as an exclusive benefactor
129 relationship, destruction of both was certain.

130 **21.** Defendant published screenshots of civil complaints and foreclosure filings and presented
131 the allegations contained therein as conclusive facts.

132 **22.** Defendant did not publish subsequent developments, negotiated resolutions, or favorable
133 outcomes involving Plaintiff.

134 **23.** Defendant’s selective publication created a materially misleading impression that Plaintiff
135 routinely lost legal proceedings or failed to defend himself.

The Wage Allegations

136 **24.** On December 24, 2025, Defendant published that RUSH employees “still haven’t been
137 paid.” A true and correct copy of that publication is attached hereto as Exhibit D.

138 **25.** Between December 15 and December 22, 2025, RUSH disbursed \$23,764 in wages to
139 employees.

140 **26.** Defendant’s statement was false.

141 **27.** Defendant presented the statement as a factual declaration rather than opinion.

The Attorney General Allegation

142 **28.** On January 7, 2026, Defendant published “Attorney General involved.” A true and
143 correct copy is attached hereto as Exhibit E.

144 **29.** At the time of publication, no wage-related lawsuit had been filed, and no Attorney
145 General investigation was open.

146 **30.** Defendant’s statement was false and presented as fact.

The Liquor License Misrepresentation

147 **31.** On February 17, 2026, Defendant published that “RUSH has LOST their liquor license
148 AGAIN.” A true and correct copy of that publication is attached hereto as Exhibit C.

149 **32.** At the time of publication, the Alcoholic Beverage and Cannabis Administration had
150 issued an Order to Cease and Desist and Stay of Application pending compliance—not a
151 revocation or permanent loss of licensure. A true and correct copy of that Order is
152 attached hereto as Exhibit A.

153 **33.** Defendant’s present-tense declaration that RUSH had “lost” its liquor license was
154 materially false and misleading.

The Fugitive Accusations

155 **34.** In late December 2025, Defendant began circulating rumors that Plaintiff had an
156 outstanding arrest warrant that was issued in June of 2025.

157 **35.** In response, Plaintiff personally appeared at a Metropolitan Police Department facility
158 and requested a search of available databases for outstanding warrants.

- 159 **36.** Plaintiff was informed that no active or outstanding warrants were reflected.
- 160 **37.** Plaintiff has no criminal history. In October 2025, Plaintiff underwent a comprehensive,
161 national background check in connection with the alcohol license application, which
162 returned no warrants and no criminal history. A redacted copy is attached hereto as
163 Exhibit G.
- 164 **38.** Plaintiff was never served with any arrest warrant related to the matter later referenced by
165 Defendant.
- 166 **39.** Plaintiff was never cited, stopped, or contacted by any law enforcement officer in
167 Montgomery County, Maryland in connection with that matter.
- 168 **40.** Upon later learning that a warrant had been issued, Plaintiff promptly addressed the
169 matter through appropriate legal channels.
- 170 **41.** The warrant was quashed and resolved prior to Defendant’s February 17, 2026,
171 publications.
- 172 **42.** On February 17, 2026—days after the warrant was quashed—Defendant published that
173 Plaintiff was a “wanted fugitive” and referenced “FUGITIVE FROM JUSTICE –
174 LARCENY.” A true and correct copy of that publication is attached hereto as Exhibit B.
- 175 **43.** At the time of publication, no active warrant existed.
- 176 **44.** Defendant’s portrayal of Plaintiff as a fugitive was false.

Creditworthiness and Financial Destabilization

- 177 **45.** Defendant’s portrayal of Plaintiff as criminal, dishonest, and financially insolvent
178 materially impaired Plaintiff’s perceived creditworthiness.

- 179 **46.** Financial institutions evaluate reputational stability and legal exposure when assessing
180 lending decisions.
- 181 **47.** Defendant's publications foreseeably undermined Plaintiff's ability to secure replacement
182 or supplemental credit facilities during RUSH's early operational phase.
- 183 **48.** The impairment of credit access contributed to operational strain that would not
184 otherwise have occurred.

Community Impact and Loss of Venue

- 185 **49.** RUSH was one of the largest LGBTQ-oriented establishments to open in the District at
186 the time of its launch.
- 187 **50.** RUSH was designed and operated as a safe and inclusive gathering space within the
188 LGBTQ community.
- 189 **51.** The establishment had not yet had the opportunity to establish long-term patronage or
190 brand stability when Defendant's campaign escalated.
- 191 **52.** Newly opened businesses are uniquely vulnerable to reputational shock during their
192 initial growth phase.
- 193 **53.** As Defendant's publications intensified and calls for boycott gained traction, RUSH
194 experienced a catastrophic drop in patronage during its earliest and most formative
195 period. The hostile public reaction to Defendant's publications is reflected in numerous
196 inflammatory comments attached hereto as Exhibit H.
- 197 **54.** As a result of the resulting financial destabilization, employees lost their income and job
198 stability.

- 199 **55.** The landlord lost an income-producing tenant amid escalating public controversy
200 surrounding the property.
- 201 **56.** Vendors, contractors, and service providers were adversely affected by the disruption.
- 202 **57.** Defendant's conduct foreseeably extended beyond Plaintiff personally and impacted
203 innocent third parties who relied on the continued operation of RUSH.

Personal Safety and Relational Harm

- 204 **58.** Following Defendant's wide-ranging accusations, Plaintiff received hostile and
205 threatening communications.
- 206 **59.** Certain communications contained language that Plaintiff reasonably interpreted as
207 threats to his personal safety.
- 208 **60.** Defendant publicly referenced Plaintiff's spouse while redacting other individuals,
209 exposing Plaintiff's partner to unwanted scrutiny.
- 210 **61.** That exposure caused embarrassment and strain within Plaintiff's marriage.
- 211 **62.** Plaintiff has withdrawn from public outings due to reputational hostility and safety
212 concerns.

Media Amplification

- 213 **63.** On multiple occasions, established media outlets contacted Plaintiff seeking comment on
214 specific allegations before those allegations were broadly disseminated outside
215 Defendant's communications.

216 **64.** The specificity of those inquiries indicated that Defendant had communicated allegations
217 directly to media representatives.

218 **65.** Upon information and belief, Defendant distributed allegations concerning Plaintiff
219 beyond his public social media posts.

Limited-Purpose Public Figure and Actual Malice

220 **66.** Plaintiff recognizes that, by virtue of his role in connection with RUSH, he is deemed a
221 limited-purpose public figure with respect to commentary concerning that business and
222 related controversies.

223 **67.** Plaintiff does not concede that accusations of personal criminal conduct fall within the
224 scope of any legitimate public controversy.

225 **68.** Even assuming arguendo that Plaintiff is a limited-purpose public figure for certain
226 business-related matters, Defendant acted with actual malice.

227 **69.** Defendant branded Plaintiff a “fugitive” after the referenced warrant had been quashed
228 and resolved. Defendant encouraged and certified this active warrant and fugitive status,
229 going so far as to repost commentary.

230 **70.** Defendant declared that RUSH had “LOST” its liquor license when no revocation had
231 occurred.

232 **71.** Defendant stated that RUSH filed a false tax document absent any final adjudication.

233 **72.** Defendant announced “Attorney General involved” when no such involvement existed.

234 **73.** Defendant declared that employees “still haven’t been paid” despite documented wage
235 disbursements.

- 236 **74.** Defendant failed to verify these statements before publication.
- 237 **75.** Defendant failed to correct these statements after their falsity became apparent.
- 238 **76.** Defendant continued publishing and amplifying defamatory statements even after
239 underlying issues were resolved.
- 240 **77.** Defendant selectively published negative legal filings while omitting settlements and
241 favorable outcomes.
- 242 **78.** The pattern of escalation, refusal to verify, and continued publication demonstrates
243 reckless disregard for the truth.
- 244 **79.** Any legitimate public controversy concerned business operations—not criminal conduct.
- 245 **80.** Accusations of fugitive status, larceny, and criminality were outside the scope of any
246 public debate and were manufactured escalations introduced by Defendant.

Coordinated Conduct and Improper Motive

- 247 **81.** Defendant did not act independently.
- 248 **82.** Plaintiff has received credible, confirmed information from an individual with direct
249 knowledge that a specific competing bar owner provided Defendant with inflammatory
250 information concerning Plaintiff and RUSH.
- 251 **83.** Plaintiff has received credible, confirmed information from multiple individuals with
252 direct knowledge that certain parties disgruntled by Plaintiff’s first attempt to open
253 RUSH in 2023—specifically those involved in the proposed location’s condominium
254 association—supplied Defendant with false and misleading information concerning

255 Plaintiff and RUSH. Those individuals encouraged escalation and inflammation at any
256 cost. Defendant knew this information was unreliable.

257 **84.** Plaintiff has received credible, confirmed information from multiple individuals with
258 direct knowledge that certain other competing bar owners encouraged and incentivized
259 Defendant to continue his campaign going so far as to say, “just get him gone and
260 bankrupt.”

261 **85.** The specific competing owner had a financial interest in shifting the media “spotlight”
262 from himself to Plaintiff due to his own controversies.

263 **86.** The other competing bar owners had significant financial interest in Plaintiff’s downfall.

264 **87.** The specific competing owner had an interest in decreasing saturation, tipping scales so
265 that his new location—modeled as a direct competition to RUSH—will succeed.

266 **88.** The competing owner made his intentions and desires clear to Defendant.

267 **89.** The involved members of the condominium association had interest in Plaintiff’s
268 complete downfall, no matter the direct and collateral damage.

269 **90.** Upon information and belief, Defendant received benefits, access, or other incentives in
270 connection with the publication and amplification of allegations concerning Plaintiff.

271 **91.** The timing and content of Defendant’s publications corresponded with communications
272 and actions undertaken by individuals with competitive interests adverse to RUSH.

273 **92.** Defendant amplified allegations originating from those individuals without independent
274 verification.

- 275 **93.** Defendant amplified allegations of certain disgruntled employees who were dismissed for
276 a variety of reasons including, but not limited to: theft, fraud, simple assault, and
277 performance. Defendant knew the disgruntled employees should not be deemed reliable,
278 but, regardless, he published or repeated the information.
- 279 **94.** The coordinated nature of these actions evidences improper motive and supports a
280 finding of actual malice.

Continuing Conduct

- 281 **95.** Defendant’s conduct is ongoing.
- 282 **96.** Defendant continues to publish statements concerning Plaintiff.
- 283 **97.** Plaintiff reserves the right to amend this Complaint to assert additional claims arising
284 from ongoing or newly discovered publications.

**COUNT I – DEFAMATION PER SE
FALSE ACCUSATION OF CRIMINAL CONDUCT (FUGITIVE /LARCENY)**

- 285 **98.** Plaintiff incorporates paragraphs 1–97 as if fully set forth herein.
- 286 **99.** On February 17, 2026, Defendant published statements identifying Plaintiff as a “wanted
287 fugitive” and referencing “FUGITIVE FROM JUSTICE – LARCENY.”
- 288 **100.** At the time of publication, no active arrest warrant existed.
- 289 **101.** The referenced warrant had been quashed and resolved.
- 290 **102.** Plaintiff has no criminal history.

- 291 **103.** Defendant’s statements falsely portrayed Plaintiff as actively fleeing justice and having
292 committed larceny.
- 293 **104.** Accusing an individual of criminal conduct constitutes defamation per se.
- 294 **105.** Defendant published the statements as declarations of fact—not opinion.
- 295 **106.** Defendant knew the warrant had been resolved or acted with reckless disregard for the
296 truth.
- 297 **107.** Defendant had the responsibility to verify and fully document prior to presenting
298 something as fact. Online portals and other uncertified means are not sufficient.
- 299 **108.** Defendant continued publication after resolution of the warrant.
- 300 **109.** As a direct and proximate result, Plaintiff suffered reputational harm, threats to personal
301 safety, emotional distress, loss of community standing, and economic injury.

COUNT II – DEFAMATION

FALSE STATEMENT THAT RUSH “LOST” ITS LIQUOR LICENSE

- 302 **110.** Plaintiff incorporates paragraphs 1–109.
- 303 **111.** On February 17, 2026, Defendant published that “RUSH has LOST their liquor license
304 AGAIN.”
- 305 **112.** RUSH had not permanently lost or had revoked its liquor license.
- 306 **113.** The Alcoholic Beverage and Cannabis Administration issued an Order to Cease and
307 Desist and Stay of Application pending compliance—not a revocation.

- 308 **114.** Defendant’s present-tense declaration conveyed that the license had been permanently
309 revoked.
- 310 **115.** Defendant’s statement was materially false and misleading.
- 311 **116.** Defendant published the statement as fact.
- 312 **117.** Defendant acted with actual malice in failing to accurately characterize the regulatory
313 action.
- 314 **118.** The publication further destabilized landlord confidence, lender relationships, and public
315 perception.
- 316 **119.** Plaintiff suffered economic and reputational harm as a result.

COUNT III – DEFAMATION

FALSE STATEMENT REGARDING “FALSE CLEAN HANDS TAX DOCUMENT”

- 317 **120.** Plaintiff incorporates paragraphs 1–119.
- 318 **121.** Defendant published that “Rush filed a false clean hands tax document.” A true and
319 correct copy is attached hereto as Exhibit F.
- 320 **122.** At the time of publication, no final adjudication had determined that any document was
321 false.
- 322 **123.** The matter had been referred for review and investigation.
- 323 **124.** Defendant presented an unproven allegation as established fact.
- 324 **125.** The statement implied fraudulent conduct.

325 **126.** Defendant acted with reckless disregard for the truth.

326 **127.** Plaintiff suffered reputational and financial damages.

COUNT IV – DEFAMATION

FALSE STATEMENT THAT EMPLOYEES “STILL HAVEN’T BEEN PAID”

327 **128.** Plaintiff incorporates paragraphs 1–127.

328 **129.** On December 24, 2025, Defendant published that RUSH employees “still haven’t been
329 paid.”

330 **130.** RUSH disbursed \$23,764 in wages between December 15 and December 22, 2025.

331 **131.** Defendant’s statement was false.

332 **132.** Defendant presented the statement as factual.

333 **133.** Defendant acted with actual malice or reckless disregard.

334 **134.** The publication contributed to boycott activity and financial destabilization.

335 **135.** Employees lost their jobs and Plaintiff suffered economic harm.

COUNT V – DEFAMATION

FALSE STATEMENT REGARDING ATTORNEY GENERAL INVOLVEMENT

336 **136.** Plaintiff incorporates paragraphs 1–135.

337 **137.** On January 7, 2026, Defendant published “Attorney General involved” in connection
338 with wage matters.

339 **138.** At the time, no wage-related lawsuit had been filed, and no Attorney General
340 investigation was open. At the time of this filing, no wage-related lawsuit has been filed,
341 and no inquires or investigations by the Attorney General have been opened

342 **139.** The statement was false.

343 **140.** Defendant had the duty to fully verify any statements prior to publishing.

344 **141.** Defendant published the statement as fact.

345 **142.** Defendant acted with reckless disregard for the truth.

346 **143.** Plaintiff suffered reputational and economic harm as a result.

COUNT VI – FALSE LIGHT INVASION OF PRIVACY

347 **144.** Plaintiff incorporates paragraphs 1–143.

348 **145.** Defendant engaged in a sustained campaign portraying Plaintiff as criminal, dishonest,
349 financially reckless, and unfit.

350 **146.** Defendant selectively published allegations while omitting resolutions and favorable
351 outcomes.

352 **147.** Defendant’s cumulative publications placed Plaintiff before the public in a false and
353 highly offensive light.

354 **148.** Defendant knew and recklessly disregarded the falsity of the publicized matter in favor of
355 economic and interpersonal advantage.

356 **149.** Plaintiff suffered reputational damage, emotional distress, and relational harm.

**COUNT VII – TORTIOUS INTERFERENCE
BUSINESS RELATIONSHIPS**

- 357 **150.** Plaintiff incorporates paragraphs 1–149.
- 358 **151.** Plaintiff maintained valid business relationships with his landlord, employees, vendors,
359 lenders, and patrons.
- 360 **152.** Defendant knew of RUSH and its business relationships.
- 361 **153.** Defendant intentionally published false statements that foreseeably impaired those
362 relationships.
- 363 **154.** Defendant acted solely to harm Plaintiff, not as a news source.
- 364 **155.** Defendant’s conduct impaired patronage, creditworthiness, lender confidence, and vendor
365 relationships.
- 366 **156.** Employees lost compensation and the landlord lost income.
- 367 **157.** Defendant’s conduct was intentional, improper, and without privilege.
- 368 **158.** Plaintiff suffered damages as a direct and proximate result.

COUNT VIII – INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS

- 369 **159.** Plaintiff incorporates paragraphs 1–158.
- 370 **160.** Defendant engaged in a sustained campaign branding Plaintiff a criminal and fugitive.
- 371 **161.** Defendant exposed Plaintiff’s spouse to public scrutiny while redacting others.

372 **162.** Defendant’s conduct incited hostility and threats.

373 **163.** The conduct was extreme and outrageous.

374 **164.** Defendant acted, and continues to act, intentionally and with reckless disregard of the
375 probability of causing emotional distress.

376 **165.** Plaintiff suffered severe emotional distress, relational strain, social withdrawal, and
377 anxiety as a direct result of Defendant’s actions.

COUNT IX – CIVIL CONSPIRACY

378 **166.** Plaintiff incorporates paragraphs 1–165.

379 **167.** Defendant and one or more individuals with financial or competitive interests in RUSH
380 entered into an agreement, express or implied, to publish and amplify defamatory
381 statements.

382 **168.** The participants shared a common objective to damage Plaintiff’s reputation and impair
383 RUSH’s operations.

384 **169.** In furtherance of that agreement, Defendant published the statements described herein.

385 **170.** Plaintiff suffered damages as a direct and proximate result.

V. PRAYER FOR RELIEF

386 **WHEREFORE**, Plaintiff respectfully requests judgment against Defendant as follows:

387 **A.** Compensatory damages in an amount to be determined at trial, but no less than \$1,186,204,
388 representing capital invested in RUSH's leased premises, buildout, and FF&E;

389 **B.** Presumed damages for defamation per se;

390 **C.** Additional compensatory damages for reputational harm, emotional distress, relational
391 damage, and economic injury;

392 **D.** Punitive damages sufficient to deter similar conduct;

393 **E.** Injunctive relief prohibiting continued defamatory publication;

394 **F.** Costs and such further relief as the Court deems just and proper.

JURY DEMAND

395 Plaintiff hereby demands a trial by jury on all issues so triable.

February 18, 2026

Respectfully Submitted,

Jackson Phillip Mosley
By: /s/ Jackson Phillip Mosley
401 P Street, NW
Washington, DC 20001
703.395.1596

EXHIBITS

Exhibit A

Order to Cease and Desist and Stay of Application issued by the Alcoholic Beverage and Cannabis Administration (ABCA)

Exhibit B

February 17, 2026 publication identifying Plaintiff as a “fugitive” and referencing “FUGITIVE FROM JUSTICE – LARCENY”

Exhibit C

February 17, 2026 publication stating that “RUSH has LOST their liquor license AGAIN”

Exhibit D

December 24, 2025 publication stating that RUSH employees “still haven’t been paid”

Exhibit E

January 7, 2026 publication stating “Attorney General involved”

Exhibit F

February 17, 2026 publication stating that RUSH “filed a false clean hands tax document”

Exhibit G

Background check submitted in connection with the RUSH alcohol license application, certifying no criminal history or outstanding warrants

Exhibit H

Representative publications by Defendant from December 15, 2025 through February 18, 2026 demonstrating a sustained pattern of defamatory and inflammatory statements concerning Plaintiff and RUSH

Exhibit A: ABCA Order to Cease and Desist and Stay of Application

THE DISTRICT OF COLUMBIA ALCOHOLIC BEVERAGE AND CANNABIS BOARD

In the Matter of:

Rainbow Zebra, LLC
t/a Rush

Holder of a
Retailer's Class CT License

at premises
2001 14th Street, NW
Washington, D.C. 20009

License No.: ABRA-134289
Order No.: 2026-216

BEFORE: Donovan Anderson, Chairperson
Silas Grant, Jr., Member
Teri Janine Quinn, Member
Ryan Jones, Member
David Meadows, Member

ORDER TO CEASE AND DESIST AND STAY OF APPLICATION

This notice constitutes a Cease-and-Desist Order issued by the Alcoholic Beverage and Cannabis Board (Board) pursuant to D.C. Official Code § 25-829. This Cease-and-Desist Order applies to Rainbow Zebra, LLC, t/a Rush (Respondent), holder of a Retailer's Class CT License No. ABRA-134289.

The basis of this Order is that a review of the Board's official records by the Alcoholic Beverage and Cannabis Administration (ABCA) has determined that the Respondent's filed a false clean hands tax document rendering the renewal application incomplete and the Board deems the application not filed and rejected. 23 DCMR § 500.1 (West Supp. 2026). This determination was made based on the investigative report reviewed by the Board on its investigative agenda on February 11, 2026 (Item #3).

ORDER

Therefore, the Board on this 11th day of February 2026, the Board orders the following:

Exhibit B: February 17, 2026 – “Fugitive” / warrant post

 RUSH BAR 4 hours ago

Superior Court of the District of Columbia
Criminal Division
Complaint

LU#: 10

The undersigned having made oath before me declared that on the 14th day of February, 2026 at the District aforesaid, one

Mosley, Jackson

being then and there a fugitive from the state of Maryland and wanted for FUGITIVE FROM JUSTICE - LARCENY

did then and there come into the District of Columbia, in violation of Title 23 Section 701 of the District of Columbia Code.

/s/ Don J Marshall
Affiant's Name

Subscribed and sworn to before me this 14th day of February, 2026

/s/ Michael Ursiny
(Judge) (Deputy Clerk)
Superior Court of the District of Columbia

WARRANT

To The United States Marshal or any other authorized federal officer or the Chief of Police of the District of Columbia:

WHEREAS the foregoing complaint and affidavit supporting the allegations thereof have been submitted, and appearing probable cause and reasonable grounds for the issuance of an arrest warrant for Jackson Mosley

YOU ARE THEREFORE COMMANDED TO BRING THE DEFENDANT BEFORE SAID COURT OR OTHER PERSON ENUMERATED IN 18 U.S.C. 3041 forthwith to answer said charge.

Issued: 2/14/2026

Sex: Male

DOB: 12/19/1991

PCID: 767462

Charge: FUGITIVE FROM JUSTICE

Offense Date: 6/12/2025

Badge No. and Officer: 3637, Don J Marshall

Judge
Superior Court of the District of Columbia

OFFICER MUST EXECUTE RETURN

Officer's Name

Time

Date

@dchomos

“Mosley, Jackson being then and there a fugitive from the state of Maryland and wanted for FUGITIVE FROM JUSTICE - LARCENY”

**“arrest warrant for Jackson Mosley
YOU ARE THEREFORE COMMANDED
TO BRING THE DEFENDANT BEFORE
SAID COURT”**

The image shows a document from the District of Columbia Alcoholic Beverage and Cannabis Board. The document is titled "THE DISTRICT OF COLUMBIA ALCOHOLIC BEVERAGE AND CANNABIS BOARD". It is dated "RUSH BAR 8 hours ago". The document is a "Cease-and-Desist Order" issued to Rainbow Zebra, LLC, t/a Rush. The order states that the Board has determined that the Respondent's renewal application for a Retailer's Class CT License is incomplete and rejected due to a false clean hands tax document. The order is effective as of February 11, 2026. A social media post from @dchomos is overlaid on the bottom of the image, summarizing the event in bold black text.

Rush bar has lost their liquor license AGAIN. Rush filed a false clean hands tax document and the renewal has been rendered incomplete. The matter has also been referred to @dcattorneygeneral to determine if criminal action is warranted

Exhibit D: December 24, 2025 – Wage allegation / GoFundMe post

 **RUSH BAR** December 24, 2025  

SUPPORT WORKERS LEFT UNPAID BY RUSH

 **\$4,650 to goal** 

Support Workers Left Unpaid by RUSH this Holiday Season

 **Donate now!**

RushReliefDC.com

@dchomos

They still haven't been paid for their weeks of work

 Rushreliefdc.com

Please share or donate if you can

Exhibit E: January 7, 2026 – “Attorney General involved” post

 **RUSH BAR** January 7
▶ Watch full reel >

dchomos 4:00



COVERING DC
BAR OWNER RESPONDS TO MISMANAGEMENT CLAIMS
NEWS: WARNER BROS. BOARD REJECTS PARAMOUNT'S OFFER, STILL WANTS NETFLIX DEAL

STREAMING NOW 92+ 6:02 57°

BREAKING- new update on RUSH from @mattytorres - Police say no reports have been filed. Multi lawsuits. Attorney General involved.

Exhibit F: February 17, 2026 – “False clean hands tax document” statement (same story series)

 RUSH BAR 8 hours ago

THE DISTRICT OF COLUMBIA
ALCOHOLIC BEVERAGE AND CANNABIS BOARD

In the Matter of:

Rainbow Zebra, LLC
t/a Rush

Holder of a
Retailer's Class CT License

at premises
2001 14th Street, NW
Washington, D.C. 20009

License No.: ABRA-134289
Order No.: 2026-216

BEFORE: Donovan Anderson, Chairperson
Silas Grant, Jr., Member
Teri Janine Quinn, Member
Ryan Jones, Member
David Meadows, Member

ORDER TO CEASE AND DESIST AND STAY OF APPLICATION

This notice constitutes a Cease-and-Desist Order issued by the Alcoholic Beverage and Cannabis Board (Board) pursuant to D.C. Official Code § 25-829. This Cease-and-Desist Order applies to Rainbow Zebra, LLC, t/a Rush (Respondent), holder of a Retailer's Class CT License No. ABRA-134289.

The basis of this Order is that a review of the Board's official records by the Alcoholic Beverage and Cannabis Administration (ABCA) has determined that the Respondent's filed a false clean hands tax document rendering the renewal application incomplete and the Board deems the application not filed and rejected. 23 DCMR § 500.1 (West Supp. 2026). This determination was made based on the investigative report reviewed by the Board on its investigative agenda on February 11, 2026 (Item #3).

ORDER

Therefore, the Board on this 11th day of February 2026, the Board orders the following:

@dchomos

Rush bar has lost their liquor license AGAIN. Rush filed a false clean hands tax document and the renewal has been rendered incomplete.

The matter has also been referred to @dcattorneygeneral to determine if criminal action is warranted

Exhibit G: Background Check Dated 10/08/2025 for

Jackson Phillip Mosley (Yu Mosley, Mosley Yu)



NATIONAL CRIMINAL AND OFFENSE REPORT

Applicant name	JACKSON PHILLIP YU / MOSLEY
Date of birth	[REDACTED]
Social security number (SSN)	[REDACTED]
Jurisdictions searched	All, including sex offender registries
Report dated:	10/08/2025
Order ID:	4646657

Notice to employers operating in California: California law requires the following notices when obtaining a pre-employment screening report. This report is only provided on the condition that an employer subject to California law agrees to abide by these conditions. Furthermore, by requesting a screening report, an employer certifies compliance with California Civil Code Section 1786.16.

1. The report does not guarantee the accuracy or truthfulness of the information as to the subject of the investigation, but only that it is accurately copied from public records. Evidence of identity theft may or may not be identified from this report.
2. The recipient of this report shall give a copy of this report to the subject of the report.
3. Failure to provide a copy of the report as required by law may expose you to liability as specified in Section 1786.50. Section 1786.50 provides for fines and damages in the event a consumer is harmed by an employer not complying with this section. Section 1786.16 refers to certain requirements already in existence, such as obtaining releases.

No criminal, sex offender, or national security records found for this individual.

Notice to employers: If you intend to take adverse action as a result of this report, including but not limited to failure to hire, you must provide the subject of this report a copy of the report along with our contact information and a [summary of their rights under the Fair Credit Reporting Act](#).

Provider reference: 7 DC SKU: 20

Exhibit H: Representative Publications (Pattern Evidence)

The following are representative screenshots and images showing the pattern and course of publications.

Exhibit H-1: December 18, 2025 – Lawsuit post (1)



RUSH BAR December 18, 2025

...

✕

**Five separate lawsuits have
been filed against the owner
of Rush his year with
demands totaling
\$2.5million**

7/17/2025 10:13:47 AM
Superior Court
of the District of Columbia

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Civil Division – Civil Actions Branch

Studio 100a, LLC dba Teass \ Warren Architects
Plaintiff
609 H Street NE, Suite 600
Washington, DC 20002
v.
Jackson Mosley
Kevin Yu
Defendants
[REDACTED]

Civil Action Number: 2025-CAB-004633
Judge _____

COMPLAINT for BREACH OF CONTRACT and FRAUD
ACTION INVOLVING REAL ESTATE

Subject matter jurisdiction of this Court is founded on D.C. Code § 11-921.

Plaintiff, Studio 100a, LLC, doing business as Teass / Warren Architects, through the undersigned counsel, hereby presents this Verified Complaint against Defendants, Jackson Mosley and Kevin Yu, hereafter and collectively, Defendants, and states as follows:

PARTIES

In Personam jurisdiction of this Court is founded on D.C. code § 13-423.

Plaintiff is a limited liability company doing business in the District of Columbia as Teass / Warren Architects.

Defendants are residents of the District of Columbia, residing at 401 P Street, NW, Washington, DC 20001.

FACTUAL BACKGROUND

On or about March 20, 2024 parties entered a contract (*Plaintiff's Exhibit 1*) calling on the Plaintiff to provide architectural services to the Defendants for their residence at [REDACTED], Washington, DC in exchange for payments by Defendants to Plaintiff as specified in said contract.

Throughout the period from on or about March 20, 2024 to on or about October 1, 2024 the Plaintiff provided architectural services pursuant to the contract and sought payment via invoice on or about: May 5, 2024; June 5, 2024; July 5, 2024; August 5, 2024; September 5, 2024 and October 5, 2024. In addition to sending the Defendants invoices, between September 25, 2024 and December 4, 2024, principals and employees of the Plaintiff contacted the Defendants seeking overdue payments. At no point did the Defendants claim any invoice contained an error or stated incorrectly the amount owed by the Defendants

Case No. 2025-CAB-004633
Studio 100a LLC dba Teass \ Warren Architects
Next hearing 2/20/26

Send message...



Exhibit H-2: December 18, 2025 – Lawsuit post (2)

 RUSH BAR December 18, 2025

Filed
8/12/2025 2:54:09 PM
Superior Court
of the District of Columbia

Superior Court of the District of Columbia

CIVIL DIVISION - CIVIL ACTIONS BRANCH
INFORMATION SHEET

TBF Financial, LLC Case Number: 2025-CAB-005353
Plaintiff(s)
vs
Jackson P. Mosley et al Date: 08/11/2025
Defendant(s)

☐ One of the defendants is being sued in their official capacity.

Name: (Please Print)	Relationship to Lawsuit
Firm Name: Cohn, Goldberg & Deutsch, LLC	☒ Attorney for Plaintiff
Telephone No.: 410-296-2550 DC Bar No.: DC bar No. 1631983	☐ Self (Pro Se)
	☐ Other:

TYPE OF CASE: ☒ Non-Jury ☐ 6 Person Jury ☐ 12 Person Jury
Demand: \$ 14,747.00 Other:

PENDING CASE(S) RELATED TO THE ACTION BEING FILED
Case No.: Judge: Calendar #:
Case No.: Judge: Calendar #:

NATURE OF SUIT: (Check One Box Only)		
CONTRACT ☒ Breach of Contract ☐ Breach of Warranty ☐ Condo/Homeowner Assn. Fees ☐ Contract Enforcement ☐ Negotiable Instrument	COLLECTION/INS. SUB ☐ Debt Collection ☐ Insurance Subrogation ☐ Motion/Application for Judgment by Confession ☐ Motion/Application Regarding Arbitration Award	EMPLOYMENT DISPUTE ☐ Breach of Contract ☐ Discrimination ☐ Wage Claim ☐ Whistle Blower ☐ Wrongful Termination
REAL PROPERTY ☐ Condo/Homeowner Assn. Foreclosure ☐ Declaratory Judgment ☐ Drug Related Nuisance Abatement ☐ Ejectment ☐ Eminent Domain ☐ Interpleader ☐ Other ☐ Quiet Title ☐ Specific Performance	FRIENDLY SUIT ☐ HOUSING CODE REGULATIONS ☐ QUI TAM ☐ STRUCTURED SETTLEMENTS	
ADMINISTRATIVE PROCEEDINGS ☐ Administrative Search Warrant ☐ App. for Entry of Jgt. Defaulted Compensation Benefits ☐ Enter Administrative Order as Judgment ☐ Libel of Information ☐ Master Meter ☐ Petition Other	MALPRACTICE ☐ Medical - Other ☐ Wrongful Death ☐ Release Mechanics Lien ☐ Request for Subpoena ☐ APPLICATION FOR INTERNATIONAL FOREIGN JUDGMENT	AGENCY APPEAL ☐ Dangerous Animal Determination ☐ DCPS Residency Appeal ☐ Merit Personnel Act (OEA) ☐ Merit Personnel Act (OHR) ☐ Other Agency Appeal

Case No. 2025-CAB-005353
TBF Financial, LLC
Next hearing 1/16/2026

Exhibit H-3: December 18, 2025 – Lawsuit post (3)

 RUSH BAR December 18, 2025

SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA
CIVIL DIVISION

Movement Mortgage, LLC
c/o Orlans Law Group PLLC
1602 Village Market Blvd SE, Suite 310
Leesburg, VA 20175
Plaintiff,

v.

Jackson Phillip Mosley
Serve:
[REDACTED]
Washington, DC 20001

Case No: _____

AND

The United States of America
Serve:
United States Attorney
for the District of Columbia
c/o Civil Process Clerk
555 4th Street NW
Washington, DC 20530

Serve:
Office of the Attorney General
950 Pennsylvania Avenue NW
Room 511
Washington, DC 20530

Defendants.

COMPLAINT FOR JUDICIAL FORECLOSURE
(ACTION INVOLVING REAL PROPERTY)

Plaintiff, Movement Mortgage, LLC ("Plaintiff"), by undersigned counsel, Orlans Law Group PLLC, Deirdre J. Catterton, Joseph M. LeNoir, Mary L. Hurley, Melanie J. Thompson and Sogol I. Plagany brings this Complaint for Judicial Foreclosure, against Jackson Phillip Mosley and The United States of America ("Defendants"), and respectfully represents to the Court as follows:

**Case No. 2025-
CAB-001992**

Orlans No: 24-011376

**Movement Mortgage, LLC
Next hearing 1/16/2026**

Exhibit H-4: December 18, 2025 – Lawsuit post (4)



RUSH BAR December 18, 2025

6/5/2025 1:53:41 PM
Superior Court
of the District of Columbia

IN THE DISTRICT OF COLUMBIA SUPERIOR COURT
CIVIL DIVISION

FREEDOM MORTGAGE CORPORATION
c/o BWW Law Group, LLC
6003 Executive Blvd, Suite 101
Rockville, MD 20852

Plaintiff,

v.

KEVIN CAO YU
[REDACTED]

JACKSON PHILLIP MOSLEY
[REDACTED]

Defendants.

2025-CAB-003608

Case No. _____

COMPLAINT FOR JUDICIAL FORECLOSURE SALE
ACTION INVOLVING REAL PROPERTY

Plaintiff, Freedom Mortgage Corporation ("Plaintiff"), by counsel, files this Complaint for judicial foreclosure under D.C. Code § 42-816 against Defendants Kevin Cao Yu and Jackson Phillip Mosley ("Defendants") and in support thereof states as follows:

PARTIES AND JURISDICTION

1. Defendants are the record owners of the real property located at 401 P Street NW, Washington, DC 20001 (the "Property"), more specifically described as:

Lot numbered One Hundred Twenty-Two (122) in Square numbered Five Hundred Ten (510) in a subdivision made by John H. Benton as per plat recorded in Liber RLH as Folio 373 in the Office of the Surveyor for the District of Columbia.

NOTE: Said property now known for assessment and taxation purposes as Lot 800 in Square 510.

Case No. 2025-CAB-003608

Freedom Mortgage Corporation

Next hearing 1/29/26

Exhibit H-5: December 18, 2025 – Lawsuit post (5)



RUSH BAR



SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Civil Division - Small Claims and Conciliation Branch
510 4th Street, NW, Room 120, Washington, D.C. 20001
(202) 879-1120 | www.dccourts.gov

eFiled
11/26/2025 10:47:51 A
Superior Court
of the District of Columbia

2025-SCB-002192

Case No.

Huska & Horgan Engineering, LLC

Plaintiff(s)

1050 30th St. NW

Address

Washington, D.C., 20007

City, State, Zip Code

276-492-0671

Phone Number

mpchapmanlawoffice@gmail.com

Email Address

vs.

Jackson Mosley and Kevin Yu

Defendant(s)

Address

Washington, DC 20001

City, State, Zip Code

Phone Number

Email Address

STATEMENT OF CLAIM

On or about March 28, 2024, Huska & Horgan Engineering, LLC ("Plaintiff") entered into a contract ("Contract") with Jackson Mosley and Kevin Yu ("Defendants").

Defendants are collectively referred to in this contract as "Client". Defendants electronically signed the Contract. Upon great faith and belief Defendants both reside at the 401 P St NW, Washington, DC 20001 address.

Plaintiff and Defendants contract was for civil engineering services for the development of [REDACTED] subject to the Terms and Conditions provided in the Contract.

Plaintiff was to be paid for their services on the development of the Property subject to the Billing and Employment Per Task and Phase, Fee Schedule, Invoices & Payment Sections of the Contract.

Defendants, then had an obligation to submit to Plaintiff such payments per the Contract as they become due. To date, Defendants have not fulfilled their obligations under the Contract for full payment of Plaintiff services.

Plaintiff has completed work on the Property. To date, Defendants owe Plaintiff \$2,946.38 based upon the unpaid invoices and the applicable 8% surcharging interest rate found in the Contract signed between the parties.

Request for Relief:

Wherefore, Plaintiff respectfully requests this Honorable Court for:

\$2,946.38 in monetary damages from Defendant.

any pre-judgement interest and post-judgement interest as the court deems fit and proper

any other form of relief as the court deems fit and proper

any costs, court costs, and attorneys fees incurred by Plaintiff as the court deems fit and proper

Civil Activity 2025

Small Claims Notice 11

Case No. 2025-SCB-002192
Huska & Horgan Engineering, LLC
Next hearing 1/14/26

Exhibit H-6: December 18, 2025 – “Oops missed a case” post

RUSH BAR December 18, 2025

6/5/2025 6:59:09 PM
Superior Court
of the District of Columbia

Superior Court of the District of Columbia

CIVIL DIVISION - CIVIL ACTIONS BRANCH

INFORMATION SHEET

IZQUIERDO, DANIEL, et al. Case Number: 2025-CAB-003614
Plaintiff(s)
VS Date: June 5, 2025
JACKSON MOSLEY
Defendant(s) ☐ One of the defendants is being sued in their official capacity.

Name: (Please Print) Derrick F. Moore	Relationship to Lawsuit ☒ Attorney for Plaintiff ☐ Self (Pro Se) ☐ Other:
Firm Name: Moore Law PLLC	
Telephone No.: DC Bar No.: (202) 289-7963 1645015	

TYPE OF CASE: ☐ Non-Jury ☒ 6 Person Jury ☐ 12 Person Jury
Demand: \$75,000.00 Other:

PENDING CASE(S) RELATED TO THE ACTION BEING FILED
Case No.: Judge: Calendar #:
Case No.: Judge: Calendar #:

NATURE OF SUIT: (Check One Box Only)		
CONTRACT ☒ Breach of Contract ☐ Breach of Warranty ☐ Condo/Homeowner Assn. Fees ☐ Contract Enforcement ☐ Negotiable Instrument	COLLECTION/INS. SUB ☐ Debt Collection ☐ Insurance Subrogation ☐ Motion/Application for Judgment by Confession ☐ Motion/Application Regarding Arbitration Award	EMPLOYMENT DISPUTE ☐ Breach of Contract ☐ Discrimination ☐ Wage Claim ☐ Whistle Blower ☐ Wrongful Termination
REAL PROPERTY ☐ Condo/Homeowner Assn. Foreclosure ☐ Declaratory Judgment ☐ Drug Related Nuisance Abatement ☐ Ejectment ☐ Eminent Domain ☐ Interpleader ☐ Other ☐ Quiet Title ☐ Specific Performance	FRIENDLY SUIT ☐ HOUSING CODE REGULATIONS ☐ QUI TAM ☐ STRUCTURED SETTLEMENTS	
ADMINISTRATIVE PROCEEDINGS ☐ Administrative Search Warrant ☐ App. for Entry of Jgt. Defaulted Compensation Benefits ☐ Enter Administrative Order as Judgment ☐ Libel of Information ☐ Master Meter ☐ Petition Other	MALPRACTICE ☐ Medical - Other ☐ Release Mechanics Lien ☐ Request for Subpoena	AGENCY APPEAL ☐ Dangerous Animal Determination ☐ DCP's Residency Appeal ☐ Merit Personnel Act (OEAs) ☐ Merit Personnel Act (OHR) ☐ Other Agency Appeal
☐ APPLICATION FOR INTERNATIONAL FOREIGN JUDGMENT		

Oops Missed a case
Case No. 2025-CAB-003614
Moore
Next hearing 1/2/26
Demand: \$75,000

Exhibit H-7: January 1, 2026 – Jail GIF overlay post



Exhibit H-8: January 2, 2026 – Court appearance commentary post

RUSH BAR

IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION

-----X

DANIEL IZQUIERDO, and CHRISTOPHER JOHNSON,
Plaintiffs,

v.

JACKSON MOSLEY,
Defendant.

-----X

Civ. No.: 2025-CAB-003614

Judge Julie H. Becker

**PLAINTIFFS' MOTION FOR AN ENTRY OF DEFAULT
AGAINST DEFENDANT JACKSON MOSLEY**

The plaintiffs Daniel Izquierdo and Christopher Johnson (together, the "Plaintiffs"), by and through their attorneys, hereby moves this Court for an entry of default against defendant Jackson Mosley ("Defendant") pursuant to Rule 55(a) of the D.C. Superior Court Rules of Civil Procedure. As grounds in support thereof, Plaintiff states as follows:

- On June 5, 2025, Plaintiffs filed their Complaint against the Defendant. The Complaint alleges breach of contract (Count 1), unjust enrichment (Count 2), and fraud (Count 3), and requests damages of no less than \$75,000.
- On June 6, 2025, this Court issued a case number and issued its Initial Order scheduling an initial conference for September 5, 2025.
- Plaintiffs had significant issues trying to serve the Defendant, which were detailed in Plaintiffs' August 4, 2025 Motion to Extend Service, which this Court granted on August 6, 2025, and Plaintiff's October 3, 2025 Motion for Extension of Time to Serve Complaint by an

BREAKING NEWS BREAK

Rush owner Jackson Mosley did NOT show up for his hearing this morning.

Judge Becker granted the plaintiffs Motion for Default.

And ex parte proof hearing is scheduled for March 13 to determine how much he must pay.

Exhibit H-9: January 2, 2026 – Foreclosure case post

 **RUSH BAR**

Superior Court of the District of Columbia

CIVIL DIVISION- CIVIL ACTIONS
BRANCH INFORMATION SHEET

Movement Mortgage, LLC
Plaintiff

Vs
Jackson Phillip Mosley, et al.

Case Number: 2025-CAB-001992

Date: _____
☐ One of the defendants is being sued in their official capacity

Defendants

Name: (Please Print) Deirdre J. Catterton	Relationship to Lawsuit
Firm Name: Orlans Law Group PLLC	☒ Attorney for Plaintiff
Telephone No.: (703) 777-7101 DC Bar No.: 437009	☐ Self (Pro Se)
	☐ Other: _____

TYPE OF CASE: ☐ Non-Jury ☐ 6 Person Jury ☐ 12 Person Jury

Demand: \$715,516.02 Other: _____

PENDING CASE(S) RELATED TO THE ACTION BEING FILED

Case No.: _____ Judge: _____ Calendar #: _____

Case No.: _____ Judge: _____ Calendar #: _____

NATURE OF SUIT: (Check One Box Only)

CONTRACT	COLLECTION/INS. SUB	EMPLOYMENT DISPUTE
☐ Breach of Contract	☐ Debt Collection	☐ Breach of Contract
☐ Breach of Warranty	☐ Insurance Subrogation	☐ Discrimination
☐ Condo/Homeowner Assn. Fees	☐ Motion/Application for Judgment by Confession	☐ Wage Claim
☐ Contract Enforcement	☐ Motion/Application Regarding Arbitration Award	☐ Whistle Blower
☐ Negotiable Instrument		☐ Wrongful Termination

REAL PROPERTY	FRIENDLY SUIT
☐ Condo/Homeowner Assn. Foreclosure	☐ FRIENDLY SUIT
☐ Declaratory Judgment	☐ HOUSING CODE REGULATIONS
☐ Drug Related Nuisance Abatement	☐ QUI TAM
☐ Ejectment	☐ STRUCTURED SETTLEMENTS
☐ Eminent Domain	
☐ Interpleader	
☐ Other	
☐ Quiet Title	
☐ Specific Performance	

**ALSO on Jan 16 11am is case
2025-CAB-001992**

**Mosley defaulted on a loan for a condo,
demand is \$715,516.02**

**Again Mosley has not filed and answer to the
complaint or had any contact with the court**

Exhibit H-10: January 2, 2026 – Business loan post

RUSH BAR January 2, 2026

Filed: 8/11/2025 2:54:09
Superior Court
of the District of Columbia

Superior Court of the District of Columbia

CIVIL DIVISION - CIVIL ACTIONS BRANCH
INFORMATION SHEET

Plaintiff(s): TBF Financial, LLC
vs
Defendant(s): Jackson P. Mosley et al

Case Number: 2025-CAB-005353
Date: 08/11/2025

☐ One of the defendants is being sued in their official capacity.

Name: (Please Print)	Relationship to Lawsuit
Firm Name: Cohn, Goldberg & Deutsch, LLC	☒ Attorney for Plaintiff
Telephone No: 410-296-2550 DC Bar No.: DC bar No. 1631983	☐ Self (Pro Se)
	☐ Other:

TYPE OF CASE: ☒ Non-Jury ☐ 6 Person Jury ☐ 12 Person Jury
Demand: \$ 14,747.00 Other:

PENDING CASE(S) RELATED TO THE ACTION BEING FILED
Case No. Judge: Calendar #
Case No. Judge: Calendar #

NATURE OF SUIT: (Check One Box Only)		
CONTRACT	COLLECTION/INS. SUB	EMPLOYMENT DISPUTE
☒ Breach of Contract	☐ Debt Collection	☐ Breach of Contract
☐ Breach of Warranty	☐ Insurance Subrogation	☐ Discrimination
☐ Condo/Homeowner Assn. Fees	☐ Motion/Application for Judgment by Confession	☐ Wage Claim
☐ Contract Enforcement	☐ Motion/Application Regarding Arbitration Award	☐ Whistle Blower
☐ Negotiable Instrument		☐ Wrongful Termination

The next case up for Mosley is a
hearing on Jan 16 930am
2025-CAB-005353
A loan he defaulted on.
Demand is \$14,747

Exhibit H-11: January 7, 2026 – Small claims engineer post

RUSH BAR January 7

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Civil Division - Small Claims and Conciliation Branch
510 4th Street, NW, Room 120, Washington, D.C. 20001
(202) 879-1120 | www.dccourts.gov

2025-SCB-002192

Case No.

Huska & Horgan Engineering, LLC
Plaintiff(s)
1050 30th St. NW
Address
Washington, D.C., 20007
City, State, Zip Code
276-492-0671
Phone Number
mpchapmanlawoffice@gmail.com
Email Address

Jackson Mosley and Kevin Yu
Defendant(s)
Washington, DC 20001
City, State, Zip Code
Email Address

STATEMENT OF CLAIM

On or about March 28, 2024, Huska & Horgan Engineering, LLC ("Plaintiff") entered into a contract ("Contract") with Jackson Mosley and Kevin Yu ("Defendants").

Defendants are voluntarily referred to the contract as "Client". Defendants electronically signed the Contract, upon good faith and lawful Defendants both reside at the 510 P St NW, Washington, DC 20001 address.

Plaintiff and Defendants contract was for civil engineering services for the development of 401 P St NW ("Property") subject to the Terms and Conditions provided in the Contract.

Plaintiff was to be paid for their services on the development of the Property subject to the Billing and Payment For Work and Phase, Fee Schedule, Success & Payment Sections of the Contract.

Defendants, have not or obligation to Plaintiff any payment per the Contract as they have not. To date, Defendants owe the Plaintiff obligations under the Contract for full payment of Plaintiff services.

Plaintiff has completed work on the Property. To date, Defendants owe Plaintiff \$2,946.38 based upon the calculation and the applicable & continuing obligations found in the Contract signed between the parties.

Request for Relief:
Wherefore, Plaintiff respectfully requests this Honorable Court for:

\$2,946.38 in monetary damages from Defendant.

any pre-judgement interest and post-judgement interest as the court deems fit and proper

any other form of relief as the court deems fit and proper

any costs, court costs, and attorneys fees incurred by Plaintiff as the court deems fit and proper

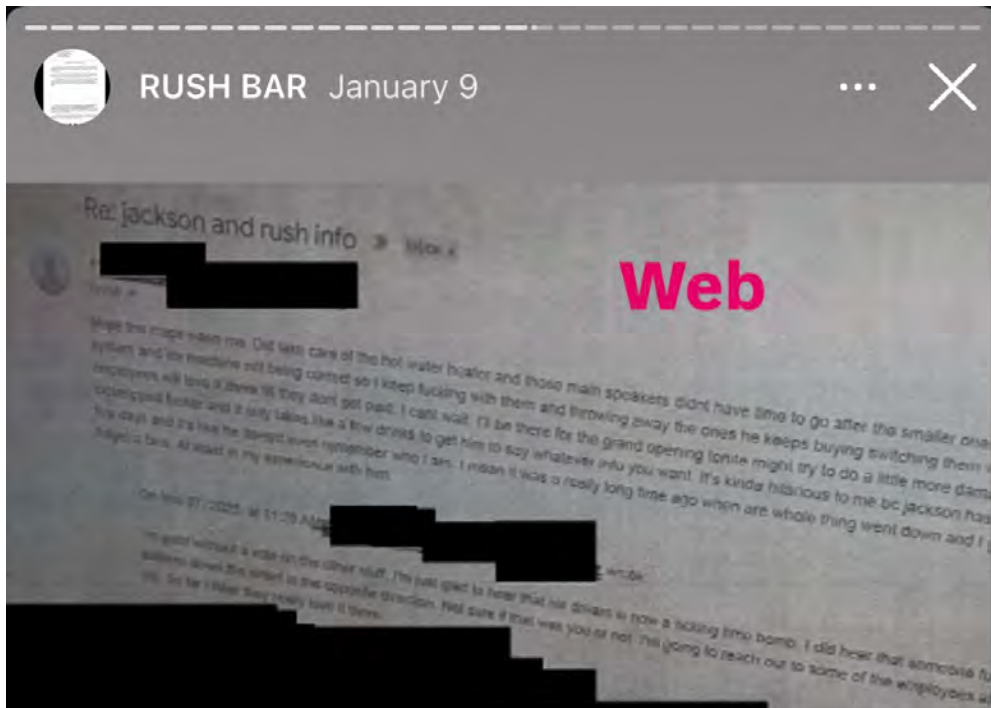
**Next lawsuit up for Rush owner
Jackson Mosley is
Case 2025-SCB-002192
Huska & Horgan Engineering, LLC
Next Wed January 14 9am**

See you there.

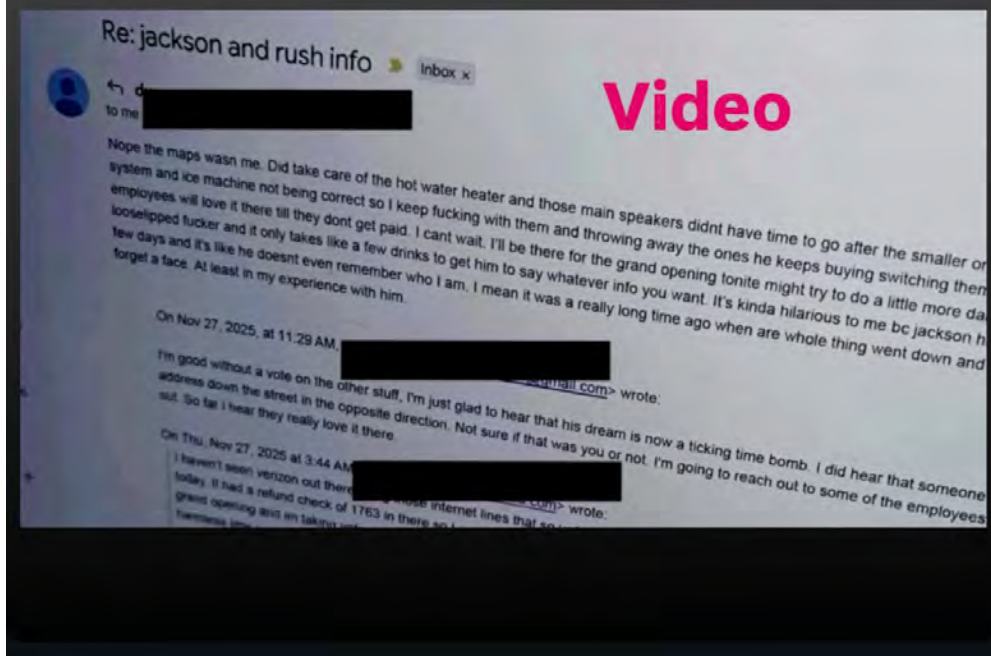
Exhibit H-12: January 9, 2026 – “RUSHstein files” post



Exhibit H-13: January 9, 2026 – Evidence quality implication post (1)



Interesting choice to released what looks to be bad photocopies of bad printouts when the version shown in his 13min video were crystal clear.



Web

d rush info Inbox x

about his investors and the managers of the fund. We found his business plan in some boxes in the basement like a
 ont work for shit. Without his investors the whole operation will crash and burn. He won't have any backups bc he mo
 es that the whole project is at least half a mil over budget rn. One person even told me that he used some of his pare
 rs said no more money until the bar is open bc the 9th st location never opened and so much was spent on that so I'm

025, at 4:21 PM [redacted] wrote:
 king for sure. What do you have and how accurate is it?

Video

d rush info Inbox x

u@icloud.com

about his investors and the managers of the fund. We found his business plan in some boxes in the basement like a ye
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 is said no more money until the bar is open bc the 9th st location never opened and so much was spent on that so I'm

25, at 4:21 PM, [redacted] wrote:
 ng for sure. What do you have and how accurate is it?

25, at [redacted] wrote:
 to fuck with rush. If you wanna take jackson and everything he cares about

Web

d rush info Inbox x

about his investors and the managers of the fund. We found his business plan in some boxes in the basement like a
 ont work for shit. Without his investors the whole operation will crash and burn. He won't have any backups bc he mo
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025, at 4:21 PM [redacted] wrote:
 king for sure. What do you have and how accurate is it?

Video

d rush info Inbox x

u@icloud.com

about his investors and the managers of the fund. We found his business plan in some boxes in the basement like a ye
 nt work for shit. Without his investors the whole operation will crash and burn. He won't have any backups bc he mo
 es that the whole project is at least half a mil over budget rn. One person even told me that he used some of his pare
 is said no more money until the bar is open bc the 9th st location never opened and so much was spent on that so I'm

25, at 4:21 PM, [redacted] wrote:
 ng for sure. What do you have and how accurate is it?

25, at [redacted] wrote:
 to fuck with rush. If you wanna take jackson and everything he cares about

Exhibit H-15: January 10, 2026 – “Confirmed source” eviction post



Re: Rush Bar

We have spoken to a confirmed source who has indicated that other than an original deposit payment, there has not been a single penny in rent that has been paid for the business.

“Jackson is currently in default, accruing daily late fees and expenses, with eviction litigation pending.”

Exhibit H-16: January 10, 2026 – Police report / false report implication post

 RUSH BAR January 10

CCN #26003177 — Event #26003177 Public Packet Metropolitan Police Department

CCN #26003177 - PUBLIC INCIDENT REPORT

REPORT DATE / TIME Jan 7, 2026 22:30	EVENT START DATE / TIME - EVENT END DATE / TIME Dec 15, 2025 00:00 - Jan 7, 2026 22:13	REPORT AUTHOR Brandon Corbit 8660 #4508
WEATHER Unknown	SHOTS FIRED ☐ YES ☒ NO	
NOTIFICATIONS NOTIFICATION MADE Other		NOTIFICATION DATE Jan 7, 2026 00:45
NOTIFICATION DETAILS Financial Crimes Unit Notified		
REPORTING PARTY-1 REPORTING PARTY-1 (PERSON) R-1 Mosley, Jackson		
HOME ADDRESS 1923 9TH STREET NW, 5, WASHINGTON, DC 20001		

PUBLIC NARRATIVE

R-1 reports at MPD's Third District Station that on 12/15/2025 he was due to pay his employees at his establishment located at 2001 14th St. N.W. (Rush Bar D.C.). R-1 advised that he was unable to pay his employees because the business line of credit for the establishment had been closed. R-1 stated that he did not close the account himself and alleged that local competing establishments in the immediate vicinity have conspired to commit acts against his business with the intent to make it fail.

**The police report Rush owner
Jackson Mosley filed.
DC law for filing a false police
report:**

**Code of the District of Columbia
§ 5-117.05. False or fictitious
reports to Metropolitan Police.
"... shall be punished by a fine of not
exceeding \$300 or by imprisonment
not exceeding 30 days."**

Exhibit H-17: January 18, 2026 – Foreclosure default post

RUSH BAR January 18
Superior Court of the District of Columbia

CIVIL DIVISION: CIVIL ACTIONS
BRANCH INFORMATION SHEET

Movement Mortgage, LLC
Plaintiff

Case Number: 2025-CAB-001892

Vs
Jackson Phillip Mouley, et al.

Date: _____
☐ One of the defendants is being sued in their official capacity

Defendants:

Name: (Please Print) Deirdre J. Catterton Relationship to Lawsuit
Firm Name: Orlans Law Group PLLC ☒ Attorney for Plaintiff
Telephone No.: (703) 777-7101 DC Bar No.: 437009 ☐ Self (Pro Se)
☐ Other: _____

TYPE OF CASE: ☐ Non-Jury ☐ 6 Person Jury ☐ 12 Person Jury

Demand: \$715,516.02 Other: _____

PENDING CASE(S) RELATED TO THE ACTION BEING FILED:
Case No. _____ Judge: _____ Calendar #: _____
Case No. _____ Judge: _____ Calendar: _____

NATURE OF SUIT: (Check One Box Only)

CONTRACT	COLLECTION/INS. SUB	EMPLOYMENT DISPUTE
☐ Breach of Contract	☐ Debt Collection	☐ Breach of Contract
☐ Breach of Warranty	☐ Insurance Subrogation	☐ Discrimination
☐ Condo/Hoasowner Assn. Fees	☐ Motion/Application for Judgment by Confession	☐ Wage Claim
☐ Contract Enforcement	☐ Motion/Application Regarding Arbitration Award	☐ Wrongful Termination
☐ Negotiable Instruments		

REAL PROPERTY		
☐ Condo/Hoasowner Assn. Functionary	☐ Ejectment	☐ Other
☐ Declaratory Judgment	☐ Eminent Domain	☐ Quiet Title
☐ Drug Related Insurance Abstention	☐ Involuntary	☐ Specific Performance

ADMINISTRATIVE PROCEEDINGS	AGENCY APPEAL
☐ Administrative Search Warrant	☐ Dispute/Arrest Determination
☐ App. for Entry of Apt. Detention/Companion Benefits	☐ DCPS Residency Appeal
☐ Enforce Administrative Order as Judgment	☐ Merit Personnel Act (DEA)
☐ Label of Information	☐ Merit Personnel Act (DOR)
☐ Master Matter	☐ Other Agency Appeal
☐ Petition Order	

CV-001 February 2023

Orlans No. 34-011376
CV-1110 (Rev. June 2017)

Super. Ct. Civ. R. 4

01/16/2026

Remote Status Hearing (11:00 AM) (Judicial Officer: Trabal, Raquel)

MINUTES - 01/16/2026

Held and Completed;
Journal Entry Details:
CourtSmart: courtroom 205/ webex Plaintiff Attorney Hurley present via webex.
Attorney Goforth Koenig present via webex. Defendant failed to appear. Default is entered against the defendant. Case Transferred to the Judgment Calendar (Mediation Disposition) Status Hearing Scheduled in Courtroom 214 on 4/24 at 11am;
Held and Completed

04/24/2026

Remote Status Hearing (11:00 AM) (Judicial Officer: Mortgage Foreclosure Disposition, Judge)

More bad legal news for the owner of Rush Bar- Friday morning after failing to show up at any hearings - Judge Trabal ruled he has defaulted in the foreclosure case of the condo he lists as his home address. Next hearing 4/24 where the lender could take possession.

Exhibit H-18: January 18, 2026 – Meme re court attendance post



Exhibit H-19: January 19, 2026 – P Street foreclosure scheduling post

 **RUSH BAR** January 19, 2026
IN THE DISTRICT OF COLUMBIA SUPERIOR COURT
CIVIL DIVISION

FREEDOM MORTGAGE CORPORATION
c/o BWV Law Group, LLC
6003 Executive Blvd, Suite 101
Rockville, MD 20852

Plaintiff,

2025-CAB-001668
Case No.

A.

KEVIN CAO YU
Washington, DC 20001

JACKSON PHILLIP MOSLEY
Washington, DC 20001

Defendants.

COMPLAINT FOR JUDICIAL FORECLOSURE SALE
ACTION INVOLVING REAL PROPERTY

Plaintiff, Freedom Mortgage Corporation ("Plaintiff"), by counsel, files this Complaint for judicial foreclosure under D.C. Code § 42-816 against Defendants Kevin Cao Yu and Jackson Phillip Mosley ("Defendants") and in support thereof states as follows:

PARTIES AND JURISDICTION

1. Defendants are the record owners of the real property located at 401 P Street NW, Washington, DC 20001 (the "Property"), more specifically described as:

Lot numbered One Hundred Twenty-Two (122) in Square numbered Five Hundred Ten (510) in a subdivision made by John H. Benton as per plat recorded in Liber RLH as Folio 373 in the Office of the Surveyor for the District of Columbia.

NOTE: Said property now known for assessment and taxation purposes as Lot 809 in Square 510.

By virtue of a deed recorded with the Recorder of Deeds, a copy of which is attached hereto as **Exhibit A**,

- The Property is located within the District of Columbia.
- Plaintiff is the beneficiary of a Deed of Trust, which is secured by the Property.
- The Court has personal jurisdiction over Defendants.
- Jurisdiction in this Court is proper under D.C. Code § 11-921.

FACTS

- Plaintiff incorporates the preceding allegations as if fully set forth herein.
- On April 4, 2024, PrimeLending, A PlainsCapital Company loaned Kevin Cao Yu \$1,481,557.00 (the "Loan"), and Kevin Cao Yu executed a promissory note (the "Note"), reflecting the Loan's terms. A copy of the Note is attached hereto as **Exhibit B**.
- To secure repayment of the Note, Kevin Cao Yu and Jackson Phillip Mosley executed a Deed of Trust (the "Deed of Trust"), dated April 4, 2024, encumbering the Property and recorded in the land records of the District of Columbia as Instrument Number 2024031938. A

Exhibit H-20: February 4, 2026 – Eviction post (1)

 RUSH BAR February 4

2/3/2026 11:35:41 AM
Superior Ct
of the District of C

 Superior Court of the District of Columbia
Civil Division – Landlord and Tenant Branch
510 4th St NW, Building B, Room 110, Washington DC 20001
202-879-4879 | dccourts.gov

Case Number

The Plaintiff(s) and Defendant(s) must provide their names and addresses.

Plaintiff(s)
1001 14th Street NW
Address (no post office boxes)
Washington, DC 20005
City, State, Zip Code
Phone Number
Email Address

vs. Defendant(s)
1001 14th Street NW
Address
Washington, DC 20005
City, State, Zip Code
Phone Number
Email Address

VERIFIED COMPLAINT FOR POSSESSION OF REAL PROPERTY – FORM 1D
(Commercial Property)

I. Basis for Complaint:

1. I, Plaintiff, swear or affirm, under penalties of perjury that I have knowledge of the facts set forth in this Complaint.

I am: ☐ Plaintiff, or ☒ Plaintiff's attorney, or ☐ Plaintiff's agent authorized to make this verification and my relationship to Plaintiff is (explain, and if Plaintiff is a corporation, include your title):

2. Plaintiff: ☒ is the Landlord or Owner, or ☐ has been appointed Personal Representative of the Estate in Case Number _____ and is authorized to take possession of the property, or ☐ is not the Landlord, Owner, or Personal Representative, but has the right to possession because (explain):

3. Plaintiff has other landlord and tenant case(s) pending against Defendant in Landlord and Tenant Court: ☐ yes ☒ no. If yes, the name and case number for the pending case(s) are:

4. Plaintiff seeks possession of commercial property located at _____, Washington, D.C.

Plaintiff seeks possession of the property because:

A. Defendant failed to pay: \$141,338.18 total amount due to the landlord from _____ (month/year) to _____ (month/year).

Defendant owes:

☒ Monthly base rent of \$141,338.18

☒ Common Area Maintenance (CAM) of \$ _____ (explain) _____

☒ Utility charges of \$19,000.19 (explain) _____

☐ Taxes of \$ _____ (explain) _____

Form 1D Page 1 of 3

@dchomos

It's official- Rush Bar is being evicted- they currently owe \$141,338.18 in back rent.

RUSH BAR February 4

FILED
2/3/2026 11:15 AM
Superior Ct.
of the District of C.

Superior Court of the District of Columbia
Civil Division – Landlord and Tenant Branch
510 4th St NW, Building B, Room 110, Washington DC 20001
202-879-4879 | dccourts.gov

Plaintiff(s)
1003 F High Meadows Road
Address (no post office boxes)
North Potomac, Maryland 20890
City, State, Zip Code
208-538-8337
Phone Number
lgm@lglaw.com
Email Address

vs. Defendant(s)
2021 FAD Street, NE
Address
Stowington, DC 20000
City, State, Zip Code
Phone Number
Email Address

Case Number

VERIFIED COMPLAINT FOR POSSESSION OF REAL PROPERTY – FORM 1D
(Commercial Property)

I. Basis for Complaint:

1. I, Pamela McCann, swear or affirm, under penalties of perjury that I have knowledge of the facts set forth in this Complaint.

I am: ☐ Plaintiff, or ☒ Plaintiff's attorney, or ☐ Plaintiff's agent authorized to make this verification and my relationship to Plaintiff is (explain, and if Plaintiff is a corporation, include your title):

2. Plaintiff: ☒ is the Landlord or Owner, or ☐ has been appointed Personal Representative of the Estate in Case Number _____ and is authorized to take possession of the property, or ☐ is not the Landlord, Owner, or Personal Representative, but has the right to possession because (explain):

3. Plaintiff has other landlord and tenant case(s) pending against Defendant in Landlord and Tenant Court: ☐ yes ☒ no. If yes, the name and case number for the pending case(s) are:

4. Plaintiff seeks possession of commercial property located at 2021 FAD Street, NE
Washington, D.C.

Plaintiff seeks possession of the property because:

A. Defendant failed to pay: \$\$41,338.38 total amount due to the landlord from January (month/year) to March 25 (month/year).
Defendant owes:
☒ Monthly base rent of \$ \$30,000.00;
☒ Common Area Maintenance (CAM) of \$ \$10,000.00 (explain) Monthly CAM charges;
☒ Utility charges of \$ \$1,338.38 (explain) charges monthly all over all months;
☐ Taxes of \$ _____ (explain) _____

Form 1D Page 1 of 3

@dchomos

Correction: \$201,342.37
with late fees

[Read the full complaint here!](#)

BYE FELICIA

Exhibit H-22: February 5, 2026 – ANC letter screenshot post

RUSH BAR February 5

ANC 1B GOVERNMENT OF THE DISTRICT OF COLUMBIA
ADVISORY NEIGHBORHOOD COMMISSION 1B

P.O. Box 25100
Washington, DC 20001
(202) 442-1100

COMMISSIONERS

MATT EAY
DC 443347
(202) 442-1100

FRANÇOIS BARRELEAUX
(202) 442-1100

JANE SYCAMORE
(202) 442-1100

AARON LEMON-STRAUSS
(202) 442-1100

ALAN KENNER
(202) 442-1100

MIGUEL TRINIDAD DE RAMO
(202) 442-1100

MATTHEW HOLDEN
(202) 442-1100

SABEL HARRIS
P.O. Box 25100
(202) 442-1100

STEPHEN HANRAHAN
(202) 442-1100

Letter Regarding Qualification Review for ABCA Licensees

Introduced by Cmr. HANRAHAN:

Alcoholic Beverage and Cannabis Administration
899 North Capitol Street, NE
Suite 4200-B
Washington, DC 20002

Dear Director Moonally:

On December 12th, 2025, ANC 1B received a renewal placard, ABRA-134289, for a Class "C" Tavern license issued to Rainbow Zebra, LLC/"Rush."

Subsequently, the community has brought to our attention that the owner, Jackson Mosley, has a history of unscrupulous business practices. Many of these are substantiated in the public record, including criminal charges as well as debts owed to the District.

ANC 1B is eager to understand what kind of investigation ABCA undertakes to ensure that an applicant meets all applicable qualifications before the issuance of a license. The Code of the District of Columbia, § 25-301, states that before issuing, transferring, or renewing a license the Board shall make sure the applicant "is of good character and generally fit for the responsibilities of licensure" and that the applicant does not owe more than \$100 in debts to the District. On December 8th, 2025, the DOB issued a lien on this applicant's property at 401 P Street NW for an amount of over \$800 dollars. A search of "Mosley, Jackson" in the DC Superior Court Portal Home Page reveals 16 unique cases involving Mr. Mosley.

When an applicant does not meet the qualifications of license ownership, harm can be done to the community. As of January 1st, some employees of Rush have reportedly not been paid, and have seemingly been misled by the owner. Going without a paycheck is especially harmful during the holiday season and a cold winter. ANC 1B finds it unacceptable that routine oversight from ABCA apparently did not reveal Mr. Mosley's adverse history in the District and prevent or at least delay, pending the curing of underlying issues, the issuance of a license.

Advisory Neighborhood Commission 1B serves the community of Inner-Columbia Heights, Shinnery, LeDroit Park, North Shaw, Meridian Hill, the U Street Corridor, and U Street Corridor.

@dchomos

Apparently ANC1B has asked for clarification/ transparency on how Rush had the liquor license renewed when " Code of the District of Columbia, § 25-301, states that before issuing, transferring, or renewing a license the Board shall make sure the applicant "is of good character and generally fit for the responsibilities of licensure" and that the applicant does not owe more than \$100 in debts to the District. On December 8th,2025, the DOB issued a lien on this applicant's property at 401 P Street NW for an amount of over \$800 dollars. A search of "Mosley, Jackson" in the DC Superior Court Portal Home Page reveals 16 unique cases involving Mr. Mosley."

The letter was signed by @miguel.ward.1 who is running for Ward 1 council member.

Exhibit H-23: February 17, 2026 – Furtherance of “Arrest Warrant” narrative

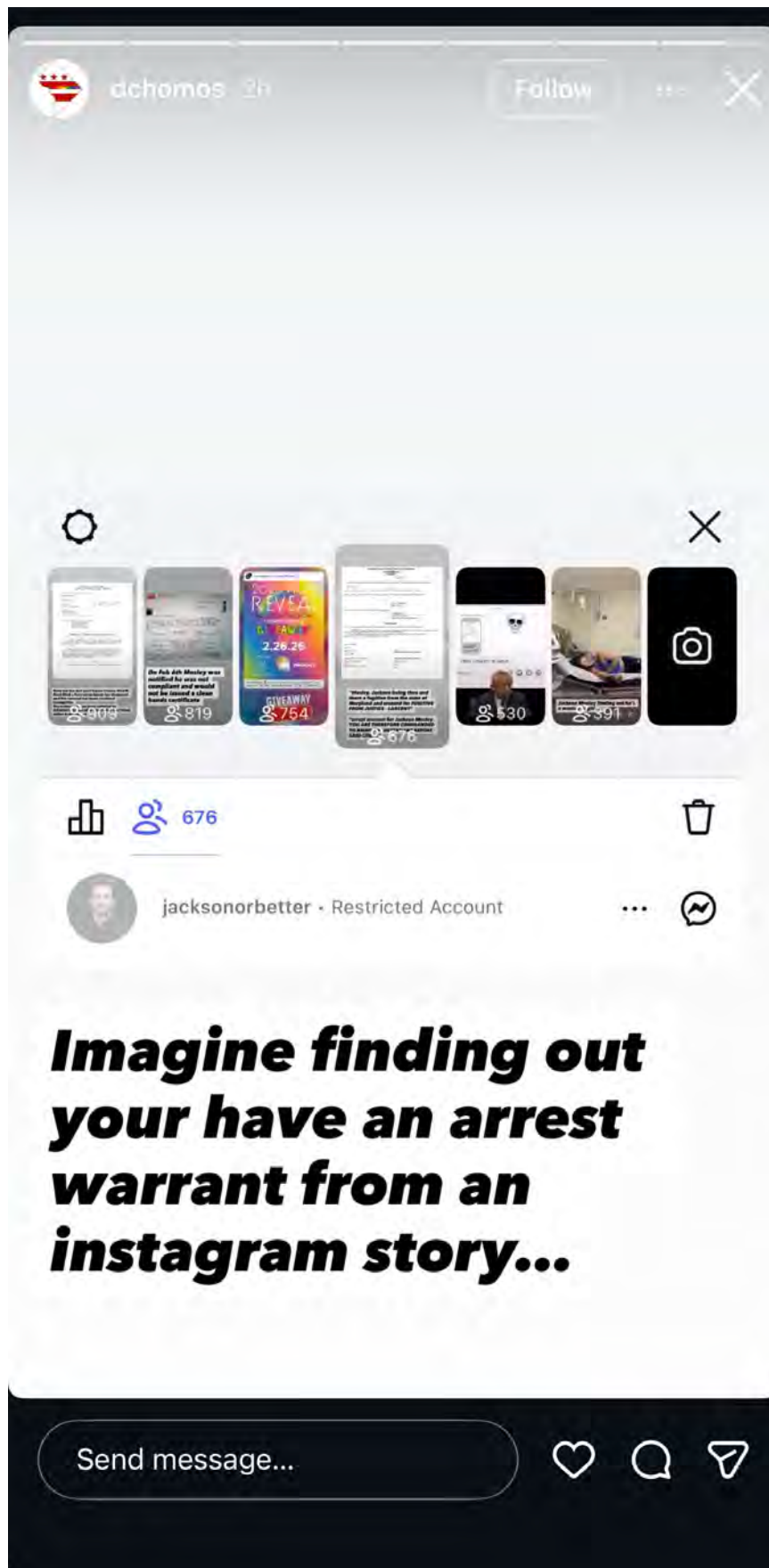


Exhibit H-24: February 17, 2026

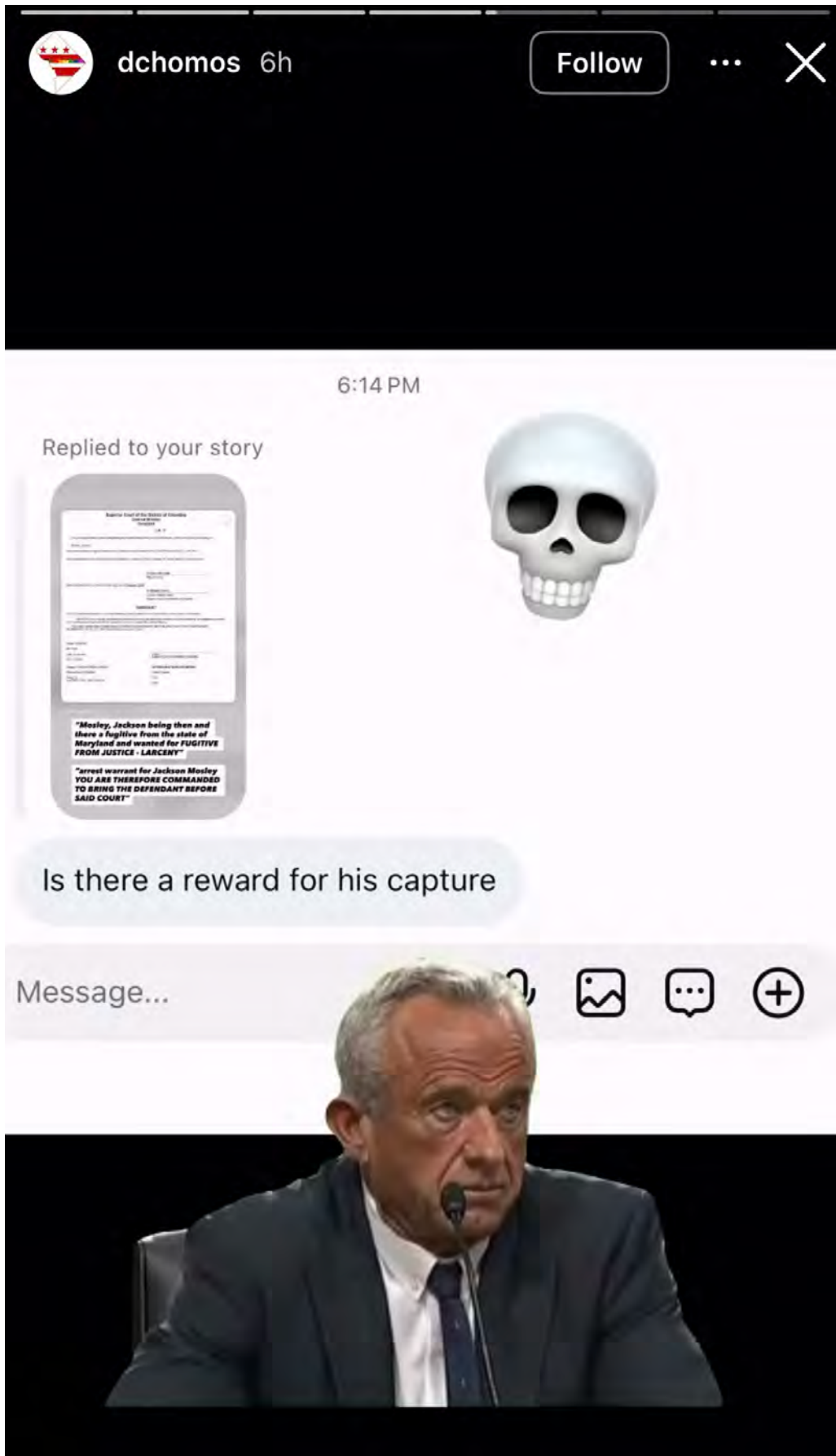


Exhibit H-25: February 17, 2026 – “Wanted Fugitive”



Exhibit H-26: February 18, 2026 – “Sociopath” post

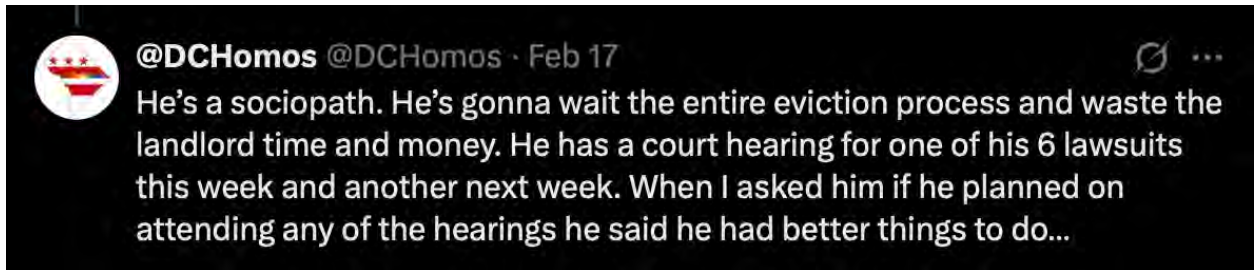


Exhibit H-27: February 17, 2026 – Earlier “fugitive” framing post



Exhibit H-28: February 17, 2026 – “Jail” Meme

